

NORGAARD O'BOYLE  
184 Grand Avenue  
Englewood, New Jersey 07631  
Telephone Number (201) 871-1333  
Facsimile Number (201) 871-3161  
Attorneys for Debtor  
By: BRIAN G. HANNON, ESQ.  
BH - 3645

---

In re:	:	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY NEWARK VICINAGE
ROBERT NUNZIATO	:	
	:	Chapter 13
Debtor.	:	

---

Case No. 17-15431 (RG)

**CERTIFICATION IN SUPPORT OF DEBTOR'S  
OPPOSITION TO THE STANDING TRUSTEE'S CERTIFICATION OF DEFAULT**

Brian G. Hannon, Esq. certifies as follows:

1. I am a Partner of Norgaard O'Boyle, counsel to the Debtor in the above-referenced matter. I write this certification in opposition to the Standing Trustee's certification of default for an order dismissing this case.
2. The Standing Trustee has filed this certification of default for the Debtor's failure to provide a copy of the 2018 Tax Return and therefore cannot determine if further monies are to be turned over to the Standing Trustee. On April 30, 2019 the Debtor provided our office with a copy of the 2018 Tax Return and same was uploaded to the trustee website accordingly. The Debtor did not receive a refund for 2018 and had to pay the IRS so there are no additional monies owed to the Standing Trustee for the 2018 taxes.
3. The Debtor is current with all trustee payments.

4. For the aforementioned reasons the Standing Trustee's certification of default for an order to dismiss the case should be denied accordingly.

I certify that the foregoing statements are true. I am aware that if the foregoing statements are willfully false, I am subject to punishment.

Dated: 4/30/19

/s/ Brian G. Hannon  
Brian G. Hannon, Esq.